

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

DONATO APONTE NAVEDO, BELKIS
ISABEL SANTIAGO MARTÍNEZ, AND
THEIR COMMUNITY OF ASSETS AND
GAINS,

Apontes,

v.

NALCO CHEMICAL COMPANY, JOSÉ
SERRANO AND HIS WIFE JANE DOE (1),
AND THEIR COMMUNITY OF ASSETS
AND GAINS, JORGE CASTILLO AND HIS
WIFE JANE DOE (2), AND THEIR
COMMUNITY OF ASSETS AND GAINS,
ASHOK PAUL DUGGAL AND HIS WIFE
JANE DOE (3), AND THEIR COMMUNITY
OF ASSETS AND GAINS AND ABC
INSURANCE,

Defendants.

Case No. 09-cv-01232-JA

Magistrate Judge Marcos E. López

**DEFENDANTS' APPENDIX OF EVIDENTIARY MATERIALS IN SUPPORT OF
THEIR MOTION FOR SUMMARY JUDGMENT**

Exhibit	Description
A	Deposition of Plaintiff Donato Aponte Navedo and selected exhibits
B	Declaration of Ashok Duggal and Exhibits Thereto
C	Plaintiff's EEOC Charge

DATED: June 21, 2011

Respectfully submitted,
NALCO COMPANY, ASHOK DUGGAL

By: s/ Natascha B. Riesco
One of Their Attorneys

Attorneys for Defendants

Arturo Diaz-Anguiera
James W. McCartney (USDC-PR No. 211511)
CANCIO, NADAL, RIVERA & DÍAZ, P.S.C.
PO BOX 364966
San Juan, PR 00936-4966
(787) 767-9625

Mark Lies II (admitted *pro hac vice*)
Natascha B. Riesco-Farinas (USDC-PR No. 222112)
SEYFARTH SHAW LLP
131 S. Dearborn Street, Suite 2400
Chicago, IL 60603
(312) 460-5000

CERTIFICATE OF SERVICE

The undersigned attorney certifies that he caused a true and correct copy of the foregoing **DEFENDANTS' APPENDIX OF EVIDENTIARY MATERIALS IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT** to be served upon the following attorneys via the CM/ECF filing system on this 21st day of June, 2011.

Miguel A. Cuadros-Pesquera
Cuadros & Cuadros
701 Ponce de Leon Ave.
Suite 215
Miramar
San Juan, PR 00907
787-725-2652
Fax: 787-724-3820
Email: macuadros@cuad-law.com

William E. Melendez-Menendez
410 Park Avenue
15th Floor #1223
New York, NY 10022
718-725-7387
Email: we.melendez@e-lex.us

s/Natascha B. Riesco